

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JAN 22 2016

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE MATTER OF)
)
THE EXTRADITION OF) Cause No. 4:16 MJ 5011 NAB
)
ROBERT LUKASZ ZENDRAN)
)

COMPLAINT
(18 U.S.C. § 3184)

I, the undersigned Assistant United States Attorney, being duly sworn, state on information and belief that the following is true and correct:

1. In this matter, I act for and behalf of the Government of Poland.
2. There is an extradition treaty in force between the United States and Poland, known as the 1996 U.S. – Poland Extradition Treaty;
3. Pursuant to the treaty, the Government of Poland has submitted a formal request through diplomatic channels for the extradition of Robert Lukasz Zendran.
4. Robert Lukasz Zendran (“Zendran”) is charged with concealing a stolen object and of robbing Dariusz Wolniak, the owner of a currency exchange company, in violation of Article 280 paragraph 1 and Article 292 paragraph 1 of the Criminal Code of the Republic of Poland, committed within the jurisdiction of the requesting state, and a decision for the arrest of Zendran was issued by Judge Aneta Szteler-Olszewska of the Regional Court at Gdynia, Poland on July 12, 2007.
5. During the period of November 8 through November 20, 1998, it is alleged that Zendran acquired a stolen silver Volkswagen Passat and used it to commit a robbery. This

vehicle, which had the registration number PAL 0220, was stolen from Zbigniew Ciszek on November 8, 1998 in Pila. Although there is no evidence that Zendran stole the vehicle, Zendran was known as being involved in trafficking stolen vehicles and he told his three accomplices that he had acquired a vehicle and tested it for the heist.

It is alleged that on the morning of the robbery, Zendran brought his accomplices in his personal car to garages somewhere outside of Pila. The silver Volkswagen Passat was parked outside a garage, and Zendran had access to the vehicle and retrieved items from its trunk. From there he brought them to his workshop and Zendran replaced the original plates on the vehicle with the stolen police plates he had also acquired bearing tag number MOF 2387. Zendran's accomplices claim that Zendran orchestrated the robbery of the currency exchange company. Each of the witnesses' testimony claims that Zendran asked them to help in the robbery, explaining that he would tell them what to do and that he had already identified the target.

After explaining to his accomplices what their role would be in the robbery, Zendran provided them with a car which had fake police plates and two police uniforms to convince the owner they were police officers. Two accomplices went into the currency exchange company with a warrant and insisted that the owner accompany them to police headquarters to have his money authenticated. When the owner entered the vehicle with PLN 217,000, USD 11,800, and DEM 20,9000 (a total value of PLN 300,300, or approximately USD 74,991) one of the accomplices dressed as a police officer put handcuffs on the owner's wrists and took the brief case full of money. Next, the owner was driven to a forest where the handcuffs were removed and the owner was tied to a tree. After the robbery, Zendran divided the proceeds of the cash stolen from the currency exchange company amongst the participants.

6. Zendran is no longer residing in Poland.

7. Julie B. Martin, an attorney in the Office of the Legal Adviser of the United States Department of State, has provided the Department of Justice with a declaration authenticating a copy of the diplomatic note by which the request for extradition was made and a copy of the extradition treaty between the United States and Poland, stating that the offense for which extradition is demanded is covered by the treaty, and confirming that the documents supporting the request for extradition are properly certified by the principal American diplomatic or consular officer in Poland, in accordance with Title 18, United States Code, Section 3190, so as to enable them to be received in evidence; and

8. The declaration from the Department of State with its attachments, including a copy of the diplomatic note from the requesting state, a copy of the relevant extradition treaty, and the certified documents submitted in support of the request, (marked collectively as Government's Exhibit #1) are filed with this complaint and incorporated by reference herein.


9. Zendran would be likely to flee if he learned of the existence of a warrant for his arrest.

WHEREFORE, the undersigned requests that a warrant for the arrest of Robert Lukasz Zendran be issued in accordance with the Extradition Treaty between the United States and Poland, and Title 18, United States Code, Section 3184, so that the fugitive may be heard and considered, and that this complaint and the warrant be placed under the seal of the court until such time as the warrant is executed.



ASSISTANT UNITED STATES ATTORNEY

Sworn to before me and subscribed in my presence this 22nd day of January,
2016, at St. Louis, Missouri



UNITED STATES MAGISTRATE JUDGE